

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**  
(Northern Division)

NATIONAL FEDERATION  
OF THE BLIND, INC., *et al.*,

\*

Plaintiffs,

\*

v.

Civil Action No. 19-2228-SAG

\*

LINDA H. LAMONE, *et al.*,

\*

Defendants.

\* \* \* \* \*

**JOINT MOTION TO EXTEND STAY OF PROCEEDINGS**

Plaintiffs and Defendants (collectively, “the Parties”), by and through their respective counsel, jointly move this Court for entry of an order extending the stay of these proceedings for an additional twenty-one (21) days beyond the current expiration of January 25, 2021 to February 15, 2021, and the Parties state the following in support thereof:

1. On November 12, 2020, the Court entered a stay of the proceedings in this case for 60 days to facilitate settlement discussions between the parties. ECF No. 77. On January 7, 2021, the Court extended that stay by an additional 14 days for the same purpose. ECF No. 78. Prior to the entry and subsequent extension of the stay, the Parties had been engaged in discovery, but had recently resumed settlement negotiations and had sought the stay from this Court in order to devote their attention to these negotiations. ECF No. 76. The current stay is scheduled to expire on January 25, 2021.

2. Since the extension of the stay, the parties have continued their fruitful negotiations but have not been able to agree on a resolution of the case. Nevertheless, the Parties believe that an extension of the stay by an additional twenty-one (21) days, so that the Parties may continue these negotiations without the need to simultaneously devote resources to discovery, would aid in their efforts to reach a negotiated resolution.

3. Accordingly, the Parties wish to extend the current stay of these proceedings, including all currently pending discovery obligations, for a period of twenty-one (21) days past the current January 25, 2021 expiration, to February 15, 2021, to allow for continued focused settlement discussions.

4. If the Parties are unsuccessful in reaching a negotiated settlement during this 21-day extension, they will notify the Court on or before the expiration of the extended stay with a joint motion to reinstate the litigation and a request for modification of the scheduling order deadlines. If the Parties appear to be making progress in their settlement negotiations, but believe that additional time would be helpful to fully resolve Plaintiffs' claims, they may also move the Court for an extension of the stay on or before the expiration of the extended stay.

Wherefore, for good cause shown, Plaintiffs and Defendants jointly move this Court for an extension of the current stay of the litigation for a period of twenty-one (21) days to February 15, 2021.

Dated: January 22, 2021

Respectfully submitted,

BRIAN E. FROSH  
Attorney General of Maryland

\_\_\_\_\_  
/s/  
ANDREA W. TRENTO  
Assistant Attorney General  
Bar No. 28816  
200 Saint Paul Place, 20th Floor  
Baltimore, Maryland 21202  
(410) 576-6472  
(410) 576-6955 (facsimile)  
atrento@oag.state.md.us

*Attorneys for Defendants*

\_\_\_\_\_  
/s/\*  
Jessica P. Weber (Fed Bar No. 17893)  
Jamie Strawbridge (Fed Bar No. 20005)  
BROWN, GOLDSTEIN & LEVY, LLP  
120 E. Baltimore Street, Suite 1700  
Baltimore, Maryland 21202  
Tel: 410-962-1030  
Fax: 410-385-0869  
jweber@browngold.com  
jstrawbridge@browngold.com

*Attorneys for Plaintiffs*

\*Electronically signed, with permission,  
by Andrea W. Trento